

Pro Se 1 (Rev. 09/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

SRIKANTH SREEDHAR

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☐ Yes ☐ No

GOOGLE LLC, TATA CONSULTANCY
SERVICES, PARSONS CORPORATION,
KPMG LLP,
RAVI DUUVURI, USICS, DSS, DOL W&H, DOL EBSA

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	SRIKANTH SREEDHAR
Street Address	1-15-49/355 DR A S RAO NAGAR, TS 500062, INDIA (current)
City and County	244 KENNEDY DR #308, MALDEN MA 02148, USA (residence)
State and Zip Code	
Telephone Number	
E-mail Address	Srikanth247365@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.



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Defendant No. 5
 Denis Riordan
 District Director
 USCIS
 JFK Federal Bldg
 Government
 Center
 Room E-160
 Boston, MA 02203

Defendant No. 1

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

GOOGLE LLC
 attn: Joe Grier [CEO Sundar Pichai]
 1600 Amphitheatre Parkway
 Mountain View, CA 94043
 support-lh@google.com

Defendant No. 6
 Carol Hamilton
 Boston Regional
 Office
 US DOT EBSA
 Boston
 15 New Sudbury St
 Suite 575
 Boston, MA 02263
 617-565-9600
 FAX 617-565-9666
 Email
 Richardson.Patricia@dot.gov

Defendant No. 2

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

PARSONS CORPORATION
 CEO, Charles Harrington
 5875 Trinity Pkwy #300, Centreville, Virginia

Defendant No. 7
 Assistant
 Secretary
 Bureau of
 Diplomatic
 Security
 Field Office
 Thomas P. O'Neill
 Federal Bldg
 10 Causeway St
 Suite 1001
 Boston, MA 02222
 Phone
 617-565-8220
 FAX 617-565-8222

Defendant No. 3

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

KPMG LLP
 Belinda Mendoza, CA Senior Manager, Global Mobility Services
 KPMG LLP Bay Adelaide Centre 333 Bay Street, Suite 1600
 Toronto, Ontario, Canada M5H 2S6
 T 416 777 8221 F 416 777 8196
 bcmendoza@kpmg.ca

Defendant No. 8
 Lucy Ferrara
 Assistant District
 Director
 Wage and Hour
 Division
 Boston District
 Office
 JFK Federal
 Building
 Room 525
 Boston, MA 02203
 Phone
 857-264-4120
 Email
 Ferrara.Lucy@dola.gov

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

RAVI DUWURI
 Roommate whose current address is not known
 656 S FAIR OAKS AVE, #D203
 SUNNYVALE CA, USA
 Landlord has lease documents that have the email
 id and phone number of Duwuri

Defendant No. 9

Rajesh Gopinathan, CEO, TCS, Address: 11 East Loop Road, 3rd Floor New York, NY 10044
 (Corporate Office, TCS House, Raveline Street, Fort, Mumbai - 400001. Maharashtra - India)
 Email: corporate.office@tcs.com

J. Gopinathan

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II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

18 USC 1542, a " violation of the Federal Wiretap Act, 18 U.S.C. § 2510, et seq.; the California Invasion of Privacy Act, Cal. Penal Code §§ 631 and 632; the California Computer Data Access and Fraud Act, Cal. Penal Code § 502, et seq.; Invasion of Privacy; Intrusion Upon Seclusion; Breach of Contract; and California Business & Professions Code § 22576. " SAC ¶¶ 279, 281. diminution-career <https://www.courthousenews.com/wp-content/uploads/2021/12/brown-google-incognito-mtd-order.pdf>

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* SRIKANTH SREEDHAR

, is a citizen of the

State of *(name)* INDIA, RESIDENT OF MASSACHUSETTS .

b. If the plaintiff is a corporation

The plaintiff, *(name)*

, is incorporated

under the laws of the State of *(name)*

and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* RAVI DUUVURI

, is a citizen of

the State of *(name)* CALIFORNIA

. Or is a citizen of

(foreign nation) INDIA

S. Sreedhar

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b. If the defendant is a corporation

The defendant, (name) PARSONS, is incorporated under
 the laws of the State of (name) VIRGINIA, and has its
 principal place of business in the State of (name) VIRGINIA.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):
 Parsons owes \$1820000 (APPROXIMATELY) as it includes ESOP Shares both before and after a 3-way-split.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I lent money to Duvvuri as he was a student. He promised to return on getting job but didn't. He was roommate. Google violated my privacy in incognito mode besides informing the Delhi High Court that there are no Indian Internet Privacy laws. Absence of law does not mean that there are no US Laws on Privacy applicable to a US Resident like me. Google displays a link to my marks secured in an undergrad course. That Portal showing that link is blocked in the European Union region. Google failed to make complete disclosure to Delhi High Court. Parsons, KPMG caused filing of incorrect tax returns in Canada. Parsons owes me approximately \$1,820,000 for ESOP Benefits and Compensation until my return to my home happens.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Ensuring my return to my home in Malden, MA. Getting ESOP/Compensation as promised by the Employer
 Protection of privacy on the Internet. (approx. \$1,820,000)
 Recovery of due amount from Duvvuri
 Directing Google to make complete disclosure to the Delhi High Court as it involves probe into the death of a student at NITK. I am facing a prospect of a 3-months-jail in India for making defamatory complaints but I stand by my complaint of Institutional Murder, Corruption, Stalking, Attempted Murder, Privacy Violations.

L. Srinanth

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I request the court to take cognizance of the conduct of the Northeast Housing Court staff, who refused to ensure entering of my case as a Criminal Case though the limitations of the eFileMA prevent me from filing criminal case. After all, 18 USC 1542 is for Criminal Cases. Had the Housing Court Staff followed General Laws Part II Title I Chapter 185C Section 20 & Rule 3.2 of Judicial Conduct Guidelines, perhaps I would have got justice sooner. I don't have financial means to approach US Court and requested employer several times by email to act. Even ESOP Account Manager, Findley, said that I use HOSTILE LANGUAGE. This compelled me to go to court as I have no other option. Had Northeast Housing Court staff cooperated by following rules, then the matter would have entered AUTOMATICALLY in the Appeals Court in Massachusetts for Criminal Cases as Housing Court Cases go to Appeals Court and not to Superior Court.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/25/2022

Signature of Plaintiff

Printed Name of Plaintiff

SRIKANTH SREEDHAR

S. Sreedhar *S. Sreedhar*

02-02-2022

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

2. The Additional page for Defendant(s)

c. If the defendant is a corporation

The defendant, (name) GOOGLE, is incorporated under the laws of the State of (name) CALIFORNIA, and has its principal place of business in the State of (name) CALIFORNIA. Or is incorporated under the laws of (foreign nation) , and has its principal place of business in (name) .

Address: Google HQ. 1600 Amphitheatre Parkway Mountain View, CA 94043, USA

S. J. Jinnanth

S. J. Jinnanth

02-02-2022

2. The Additional page for Defendant(s)

d. If the defendant is a corporation

The defendant, (name) KPMG, is incorporated under the laws of the State of (name) , and has its principal place of business in the State of (name).

Or is incorporated under the laws of (foreign nation) CANADA, and has its principal place of business in (name) TORONTO, ONTARIO.

Address: KPMG LLP Bay Adelaide Centre 333 Bay Street, Suite 4600 Toronto, Ontario, Canada M5H 2S5
T 416 777 8221 F 416 777 8196

J. Seimanth

J. Seimanth

02-02-2022

2. The Additional page for Defendant(s)

e. If the defendant is a corporation

The defendant, (name) USCIS, is incorporated under the laws of the State of (name) MASSACHUSETTS, and has its principal place of business in the State of (name) MASSACHUSETTS. Or is incorporated under the laws of (foreign nation) , and has its principal place of business in (name) .

Address:

DISTRICT 1: BOSTON

District Director: Denis Riordan

John F. Kennedy Federal Building

Government Center, Room E-160

Boston, MA 02203

S. J. J. J.

S. J. J. J.

02-02-2022

2. The Additional page for Defendant(s)

f. If the defendant is a corporation

The defendant, (name) US DOL W&H DIVISION, is incorporated under the laws of the State of (name) MASSACHUSETTS, and has its principal place of business in the State of (name) MASSACHUSETTS. Or is incorporated under the laws of (foreign nation) , and has its principal place of business in (name) .

Address:

Lucy Ferrara

Assistant District Director

Wage and Hour Division

Boston District Office

JFK Federal Building, Room 525

Boston, MA 02203

Phone: (857) 264 4720

Email: Ferrara.Lucy@dol.gov

J. Jinnanth

J. Jinnanth

02-02-2022

2. The Additional page for Defendant(s)

g. If the defendant is a corporation

The defendant, (name) US DOL EBSA, is incorporated under the laws of the State of (name) MASSACHUSETTS, and has its principal place of business in the State of (name) MASSACHUSETTS. Or is incorporated under the laws of (foreign nation) , and has its principal place of business in (name) .

Address:

Carol Hamilton

15 New Sudbury St

Suite 575

Boston, MA 02203

617-565-9600

Fax: 617-565-9666

Email: richardson.patricia@dol.gov

S. Linnanth S. Linnanth

h. If the defendant is a corporation

The defendant, (name) Tata Consultancy Services, is incorporated under the laws of the State of , and has its principal place of business in the State of .

Or is incorporated under the laws of India, and has its principal place of business in Mumbai, India.

S. Linnanth

S. Linnanth